1	THERESA M. DUNCAN Admitted <i>Pro Hac Vice</i> Law Office of Theresa M. Duncan LLC P.O. Box 2769 Santa Fe, NM 87504 (505) 710-6586	
2		
3		
4	teri@duncanearnest.com	
5	CRISTINA BORDÉ Admitted <i>Pro Hac Vice</i> Law Office of Cristina Bordé 33 E. Main Street Suite 400 Madison, WI 53703	
6		
7		
8	608-620-3307	
9	cristinaborde@gmail.com	
10	Attorneys for Evan Perkins	
11	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA	
12		
13		Ī
14	UNITED STATES OF AMERICA,	No. 1:20-cr-0238 JLT SKO
15	Plaintiff,	DEFENDANT EVAN PERKINS'
16	V.	STATEMENT REGARDING READINESS FOR TRIAL
17	v.	READIVESS FOR TRIAL
18	EVAN PERKINS,	
19	Defendant.	
20		
21		J
22	Defendant Evan Perkins, through undersigned counsel, respectfully submits this	
23	statement regarding readiness for trial as ordered by the Court. Doc. 1419.	
24	For the reasons discussed in Mr. Perkins' withdrawn Motion to Sever and Continue	
25 26	Trial (Doc. 1360) and his reply in support of that motion (Doc. 1392), and as acknowledged in	
20	the government's supplemental response thereto (Doc. 1399), defense counsel for Mr. Perkins	

Case 1:20-cr-00238-JLT-SKO Document 1439 Filed 11/28/24 Page 2 of 2

are not ready to proceed to trial as scheduled on January 14, 2025. In counsel's professional judgment, they cannot provide Mr. Perkins with the effective assistance of counsel guaranteed by the Sixth Amendment to the United States Constitution without additional time to prepare his defense. That said, Mr. Perkins objects to a continuance of the January trial date. Respectfully Submitted, /s/ Theresa M. Duncan THERESA M. DUNCAN /s/ Cristina Bordé CRISTINA BORDÉ Attorneys for Defendant Evan Perkins